

RTP:OO  
F. #2020R00442

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

KATISHA CAINE-FRANCOIS and  
SHANEE GREEN,

Defendants.

----- X

THE GRAND JURY CHARGES:

I N D I C T M E N T

Cr. No. 1:21-cr-00410 (FB)(VMS)  
(T. 18, U.S.C., §§ 371, 641,  
981(a)(1)(C), 1711, 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

I N T R O D U C T I O N T O A L L C O U N T S

At all times relevant to this Indictment, unless otherwise indicated:

1. The United States Postal Service (“USPS”) was an independent agency of the United States government. Its primary responsibility was to provide postal service, including mail processing and delivery services.
2. The Fresh Pond Finance Office located at 6080 Woodbine Street, Queens, New York (the “Fresh Pond Post Office”) was a USPS station that offered, among other things, retail services to customers.
3. The defendant KATISHA CAINE-FRANCOIS was employed by the USPS at the Fresh Pond Post Office as the lead sales and services associate. CAINE-FRANCOIS’s daily responsibilities included, among other things, mailing and weighing packages and selling stamps, money orders, postal validation imprinter labels and other postal supplies. As a lead sales and services associate, CAINE-FRANCOIS was

additionally responsible for managing the retail outlet and reviewing and preparing certain daily financial records and retail funds for bank deposit.

4. The defendant SHANEE GREEN was employed by the USPS at the Fresh Pond Post Office as a sales and services distribution associate. GREEN's daily responsibilities included, among other things, mailing and weighing packages and selling stamps, money orders, postal validation imprinter labels and other postal supplies.

5. On or about and between April 2, 2018 and August 14, 2018, both dates being approximate and inclusive, the defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN did not remit all of the proceeds of money orders purchased at the Fresh Pond Post Office to the USPS (the "Money Order Scheme"). Instead, the defendants kept some or all of the proceeds for themselves, in a total amount of approximately \$41,712.

6. On or about and between January 16, 2018 and March 5, 2020, both dates being approximate and inclusive, the defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN did not remit all of the proceeds of postal validation imprinter labels purchased at the Fresh Pond Post Office to the USPS (the "Postal Label Scheme"). Instead, the defendants kept some or all of the proceeds for themselves, in a total amount of approximately \$35,958.

#### COUNT ONE

(Conspiracy to Commit Theft of Government Funds)

7. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

8. On or about and between January 16, 2018 and March 5, 2020, both dates being approximate and inclusive, within the Eastern District of New York, the

defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN did knowingly and willfully conspire to embezzle, steal, purloin and convert to their own use and the use of others, without authority, money and things of value of the United States and a department and agency thereof, to wit: the USPS, the value of which exceeded \$1,000, contrary to Title 18, United States Code, Section 641.

9. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York, the defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about April 6, 2018, GREEN issued and voided money order serial number 24893054998 in the amount of \$1,000;

(b) On or about April 27, 2018, CAINE-FRANCOIS issued and voided money order serial number 24893063201 in the amount of \$990;

(c) On or about May 22, 2018, CAINE-FRANCOIS issued money order serial number 24893068408 to Individual #1, an individual whose identity is known to the Grand Jury, as a refund for a postal validation imprinter label;

(d) On or about August 14, 2018, CAINE-FRANCOIS issued and voided money order serial number 24893087591 in the amount of \$900;

(e) On or about August 14, 2018, GREEN negotiated money order serial number 24893087657 in the amount of \$900; and

(f) On or about October 22, 2019, GREEN issued money order serial number 25831536265 as a refund for a postal validation imprinter label.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNTS TWO THROUGH FOURTEEN  
(Theft of Government Funds – Money Order Scheme)

10. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

11. On or about the following dates, within the Eastern District of New York, the defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN, together with others, did knowingly and intentionally embezzle, steal, purloin and convert to their own use and the use of others, without authority, money and things of value of the United States and a department and agency thereof, to wit: the USPS, the value of which on each of the following dates exceeded \$1,000:

<u>Count</u>	<u>Date</u>	<u>Approximate Value</u>
TWO	April 2, 2018	\$1,800
THREE	April 6, 2018	\$2,000
FOUR	May 2, 2018	\$1,800
FIVE	May 22, 2018	\$5,200
SIX	June 5, 2018	\$2,200
SEVEN	June 21, 2018	\$5,000
EIGHT	July 10, 2018	\$5,550
NINE	July 11, 2018	\$2,500
TEN	July 23, 2018	\$2,547
ELEVEN	July 25, 2018	\$4,000
TWELVE	July 26, 2018	\$2,900



THIRTEEN	July 31, 2018	\$1,875
FOURTEEN	August 14, 2018	\$1,800

(Title 18, United States Code, Sections 641, 2 and 3551 et seq.)

COUNTS FIFTEEN THROUGH TWENTY-SEVEN

(Misappropriation of Property by Postal Service Employee – Money Order Scheme)

12. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

13. On or about the following dates, within the Eastern District of New York, the defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN, together with others, being USPS employees, did knowingly and intentionally use and convert to their own use, money, the value of which on each of the following dates exceeded \$1,000, that had come into their hands and under their control, in the execution and under color of their employment:

<u>Count</u>	<u>Date</u>	<u>Approximate Value</u>
FIFTEEN	April 2, 2018	\$1,800
SIXTEEN	April 6, 2018	\$2,000
SEVENTEEN	May 2, 2018	\$1,800
EIGHTEEN	May 22, 2018	\$5,200
NINETEEN	June 5, 2018	\$2,200
TWENTY	June 21, 2018	\$5,000
TWENTY-ONE	July 10, 2018	\$5,550
TWENTY-TWO	July 11, 2018	\$2,500

TWENTY-THREE	July 23, 2018	\$2,547
TWENTY-FOUR	July 25, 2018	\$4,000
TWENTY-FIVE	July 26, 2018	\$2,900
TWENTY-SIX	July 31, 2018	\$1,875
TWENTY-SEVEN	August 14, 2018	\$1,800

(Title 18, United States Code, Sections 1711, 2 and 3551 et seq.)

COUNT TWENTY-EIGHT

(Theft of Government Funds – Postal Label Scheme)

14. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

15. On or about and between January 16, 2018 and March 5, 2020, both dates being approximate and inclusive, within the Eastern District of New York, the defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN, together with others, did knowingly and intentionally embezzle, steal, purloin and convert to their own use and the use of others, without authority, money and things of value of the United States and a department and agency thereof, to wit: the USPS, the value of which exceeded \$1,000.

(Title 18, United States Code, Sections 641, 2 and 3551 et seq.)

COUNT TWENTY-NINE

(Misappropriation of Property by Postal Service Employee – Postal Label Scheme)

16. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

17. On or about and between January 16, 2018 and March 5, 2020, both dates being approximate and inclusive, within the Eastern District of New York, the

defendants KATISHA CAINE-FRANCOIS and SHANEE GREEN, together with others, being USPS employees, did knowingly and intentionally use and convert to their own use, money, the value of which exceeded \$1,000, that had come into their hands and under their control, in the execution and under color of their employment.

(Title 18, United States Code, Sections 1711, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE THROUGH FOURTEEN AND TWENTY-EIGHT

18. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged in Counts One through Fourteen and Twenty-Eight, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

19. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
JACQUELYN M. KASULIS  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



F #: 2021R004402  
FORM DBD-34  
JUN, 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

KATISHA CAINE-FRANCOIS AND SHANEE GREEN,

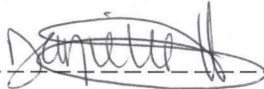
Defendants.

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**INDICTMENT**

(T. 18, U.S.C., §§ 371, 641, 981(a)(1)(C), 1711; 2 and 3551 et seq.; T.  
21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

*A true bill.*



\_\_\_\_\_  
*Foreperson*

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

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*Olatokunbo Olaniyan, Assistant U.S. Attorney, (718) 254-6317*